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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

KEVIN MEAGHER on behalf of himself and  
REBECCA DAWSON on behalf of  
themselves and all other similarly situated  
individuals,

Plaintiffs,

v.

KTC HOLDING COMPANY f/k/a THE  
KINGDOM TRUST COMPANY,

Defendant.

CASE NO. 2:24-cv-01630-CDC-MDC

**STIPULATION AND PROPOSED ORDER  
TO EXTEND TIME TO RESPOND TO  
COMPLAINT**

**(THIRD REQUEST)**

Plaintiffs KEVIN MEAGHER and REBECCA DAWSON (“Plaintiffs”) and Defendant KTC HOLDING COMPANY, formerly known as THE KINGDOM TRUST COMPANY (“Defendant,” and together with Plaintiffs, the “Parties”), by and through their respective counsel, and pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, hereby stipulate and agree as follows:

WHEREAS, Plaintiffs filed their First Amended Complaint on November 8, 2024 (ECF No. 13);

WHEREAS, on January 6, 2025, this Court entered an order granting the Parties’ second joint stipulation to extend the time to respond to the First Amended Complaint (ECF No. 15), allowing the Parties to engage in settlement discussions, making Defendant’s response deadline February 21, 2025;

WHEREAS, the Parties continue to diligently engage in settlement negotiations in good faith and request additional time to explore potential early resolution of this matter.

The Parties have made significant progress in settlement discussions and are optimistic that an agreement can be reached with additional time;

WHEREAS, the Parties have agreed to an extension of time for Defendant to respond to the First Amended Complaint, namely, April 7, 2025, to allow the Parties to continue ongoing settlement discussions;

NOW, THEREFORE, in consideration of the foregoing, the Parties hereby STIPULATE and AGREE that the deadline for Defendant to respond to the amended complaint is April 7, 2025.

The Parties represent this stipulation is made in good faith and not for the purposes of delay.

**IT IS SO STIPULATED.**

Dated this 20<sup>th</sup> day of February, 2025.

Dated this 20<sup>th</sup> day of February, 2025.

/s/ Eric W. Swanis

/s/ Kennedy M. Brian

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**IT IS SO ORDERED.**

Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge  
DATED: 2/21/2025